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May 27, 2020

BY ECF

Honorable Edgardo Ramos United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312

Re: Roman Perez et al v. Sunflower Amsterdam LLC et al

Index No. 18-cv-5875 (ER)

Dear Judge Ramos:

This office represents Plaintiffs in the above referenced matter. I am writing 1) to advise the Court that we have been informed by the family of Plaintiff Ramiro Rojas Roman that he has unfortunately passed away and 2) to request an extension of time in which to file the Plaintiffs' Proposed Order to Show Cause.

On May 5, 2020 this Court directed Plaintiffs to file a proposed Order to Show Cause by June 1, 2020. In order to have time in which to determine if Mr. Rojas Roman's estate intends to pursue his claims, or if only Plaintiff Jose Manuel Roman Perez will be seeking a judgment in default, Plaintiffs now request an extension of thirty days in which to file. There have been no previous requests of this nature. Defendants are in default and have been unresponsive to attempts at contact; hence, this request is made without their input.

We thank the Court for its time and attention to this matter.

The application is X granted ____ denied

Edgardo Ramos, U.S.D.J

Dated: May. 28, 2020
New York, New York

Respectfully Submitted,

/s/ Clela Errington

Clela A. Errington, Esq. Michael Faillace & Associates